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January 20, 2021

*Via ECF*

The Honorable Analisa Torres  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

**Re: Mizuta, et al. v. Carrana, et al., Case No. 20 CV 6014 (AT)**

Dear Judge Torres:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York, James E. Johnson, attorney for the Defendants New York City Department of Education and Richard Carranza (collectively, "DOE") in the above-referenced action. I write to respectfully request a three-week extension of DOE's time to file the certified administrative record upon which the parties will move for summary judgment in this action under the Individuals with Disabilities Education Act, in addition to requesting a three-week extension of the briefing schedule for the parties' motions for summary judgment. This is DOE's first request for an extension of its time to file the certified administrative record and of the briefing schedule in this action.

The requested three-week extension would adjust the relevant deadlines as follows:

<u>Case Event</u>	<u>Present Deadline</u>	<u>Proposed Deadline</u>
Filing of the certified administrative record	January 20, 2021	February 10, 2021
Parties file their respective motions for summary judgment	February 3, 2021	February 24, 2021
Parties file their respective oppositions	February 17, 2021	March 10, 2021
Parties file their respective replies	February 24, 2021	March 17, 2021

I respectfully request this extension because I still have not received the certified administrative record from the Office of State Review in the New York State Education Department. The record was requested, by fax, on December 18, 2020. I just received a voicemail from the Office of State Review, however, and have been informed that the record will be mailed by Monday, January 25, 2021. Given the recent delays in mail service and the reduced number of staff working in-person at the New York City Law Department, I anticipate that it will take some time for the record to make its way to my desk, for me to review it, and for it to be scanned. I believe that three weeks is sufficient time to accommodate this mailing, receipt, review, scanning, and filing of the record.

Before I received the voicemail from the Office of State Review, Plaintiffs' counsel indicated that he did not consent to this request and indicated that two weeks would be a sufficient extension. I have since sent an email to Plaintiffs' counsel informing him of the voicemail, but I have not yet received a response indicating whether this changes his view of the instant request. Given that the deadline to file the administrative record is today, however, I am filing this request without having received a response from Plaintiffs' counsel.

Thank you for your consideration of this application.

**GRANTED.** By **February 10, 2021**, the DOE shall file a copy of the administrative record. By **February 24, 2021**, the parties shall file their motions for summary judgment. By **March 10, 2021**, the parties shall file their oppositions. By **March 17, 2021**, the parties shall file their replies.

SO ORDERED.

Dated: January 21, 2021  
New York, New York




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**ANALISA TORRES**  
United States District Judge